DIRECT TESTIMONY ON SECOND REHEARING OF CHRISTOPHER J. BOYER ON BEHALF OF AMERITECH ILLINOIS

DOCKET NO. 00-0393

I. BACKGROUND

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Christopher J. Boyer. My business address is Three Bell Plaza, Dallas, Texas 75202.

Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?

A. I am employed by SBC Management Services L.P., a subsidiary of SBC Communications Inc. ("SBC"). My position is General Manager - Network Regulatory, supporting SBC's incumbent local exchange carriers ("ILECs").

Q. WHAT ARE YOUR RESPONSIBILITIES?

A. My current responsibilities include representing the interests of the planning, engineering, and operations organizations of SBC's ILECs, including Ameritech Illinois, before federal and state regulatory bodies. In particular, I address issues related to SBC's Project Pronto network architecture.

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. I have a Bachelor of Science - Business Administration degree from the University of Kansas in Lawrence, Kansas, and a Master's of Business Administration degree in Finance from the University of Houston in Houston, Texas. I also have completed

internal company training related to telecommunications networks and special services provisioning, maintenance and repair.

Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE.

A. I have been employed by SBC since August of 1993. From August 1993 through late 1998 I performed multiple functions within the Special Services organization at Southwestern Bell Telephone Company ("SWBT"). In that role, I worked as a Communications Technician and in a management role in the Special Services Test Center, with responsibility for circuit testing, provisioning, installation and maintenance for Special Access services, such as DS1s and DS3s. In late 1998, I assumed product management responsibility for SWBT's Data Networks offerings (*e.g.* Asynchronous Transfer Mode and Frame Relay) to Competitive Local Exchange Carriers ("CLECs"). As part of this latter job, between November 1999 and December 2000, I was responsible for SBC's wholesale product management related to Project Pronto.

Q. WHAT PART OF YOUR WORK EXPERIENCE QUALIFIES YOU TO ADDRESS ISSUES RELATED TO PROJECT PRONTO?

A. In my previous product management position, I was responsible for the development of the SBC Broadband Service product offering made available to CLECs over the Project Pronto DSL network architecture. In this capacity, I led an inter-disciplinary team within SBC, which included representatives from the various network organizations responsible for the deployment, service provisioning, and maintenance

of the Project Pronto DSL architecture. In addition, on behalf of SBC's ILECs, I hosted collaborative sessions with CLECs and Broadband Service trials for the purpose of discussing regulatory, network/technical and product-specific issues associated with the SBC ILECs' Broadband Service product offering and the Project Pronto DSL network architecture.

Q. HAVE YOU PREVIOUSLY FILED ANY DOCUMENTS IN THIS PROCEEDING?

A. Yes. I filed an affidavit in connection with Ameritech Illinois' original application for rehearing and filed both direct and rebuttal testimony in the previous rehearing in this docket.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I will explain why the Commission should revise its Order on Rehearing to permit Ameritech Illinois to amend Section 9.5 of the proposed tariff (the "Tariff") for Ameritech Illinois' Broadband UNE product offering.[1] Specifically, Section 9.5 should provide that a CLEC request that Ameritech Illinois deploy new line cards developed by its vendors would be subject to a Special Request Process. Under the current formulation of Section 9.5, Ameritech Illinois must deploy any new, commercially available line card produced or licensed by a manufacturer of the NGDLC equipment installed as part of its Project Pronto DSL network within just 30

NGDLC

[1] In its September 26, 2001 Order on Rehearing ("Order on Rehearing") (at 37), the Commission found that Ameritech Illinois' proposed offering was an end-to-end ~~HFPL~~ UNE to be offered over the Project Pronto architecture, and that Ameritech Illinois' offering should be made available via a tariff that was attached to the Commission's Order.

calendar days of a CLEC request for such deployment, unless Ameritech Illinois can demonstrate that doing so would not be technically or economically feasible.

Ameritech Illinois submits that, instead, the CLEC request should be evaluated and implemented pursuant to the clear, predictable guidelines of the Special Request Process, as outlined herein. Notably, this change would make Section 9.5 of the Tariff consistent with Section 7.7.2, which, pursuant to the Commission's Order on Rehearing, already subjects CLEC requests for a Constant Bit Rate ("CBR") functionality in excess of 96 kbps to the Special Request Process. Moreover, the Special Request Process is a more appropriate and realistic process for the introduction of new line cards than an inflexible 30-day implementation requirement. Unlike the 30-day requirement, the Special Request Process honors the dictates of the FCC and establishes a collaborative framework between Ameritech Illinois and the requesting CLEC in which they can together evaluate technical and economic considerations and appropriately evaluate and share development costs and risks.

In the next section of my testimony, I will briefly summarize the historical context of the Special Request Process and the manner in which it operates. Thereafter, I will discuss the relative advantages of the Special Request Process and why it should be employed in the context of CLEC requests for additional line cards under Section 9.5 of the Tariff.

II. THE SPECIAL REQUEST PROCESS

Q. WHAT IS THE SPECIAL REQUEST PROCESS?

A. The Special Request Process provides an orderly and flexible way for CLECs to request additional functions and features over the SBC ILECs' Pronto DSL architecture. It was an outgrowth of the collaborative sessions that SBC has conducted pursuant to the FCC's *Project Pronto Order*.[2] In connection with the *Project Pronto Order*, SBC committed to host and facilitate collaborative sessions with CLECs to address CLEC requests for additional features, functions and capabilities of SBC's advanced services equipment and infrastructure, and foster the ongoing development of new services.[3] In particular, the FCC ordered that the collaborative sessions address the following types of issues:

> [T]echnical and operational feasibility; commercial arrangements pertinent to the deployment of such features and functions and how those costs (*e.g.*, costs of procuring, developing, provisioning, deploying and maintaining such features and functions) will be recovered; whether technical, operations support systems and operational trials will be needed and how they will be conducted; and whether such features and functions will reduce the capacity of remote terminals to meet the forecasted demand for advanced services and POTS.[4]

The FCC further directed that, in the context of the collaborative sessions, SBC should:

> [p]rovide a process that facilitates requests by a single carrier for deployment of a desired service/functionality. Under this process, the telecommunications carrier will submit a sufficiently detailed request for

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[2] Second Memorandum Opinion and Order, CC Docket No. 98-141 (rel. September 8, 2000) (the "*Project Pronto Order*").

[3] *Project Pronto Order* at ¶¶ 42-43.

[4] *Id.* at Appendix A, ¶ 8.

> the service/functionality that it wants SBC/Ameritech to deploy. This request shall include desired network and operations functionality, service quality requirements, scope of deployment, and demand forecasts/commitments. SBC/Ameritech will timely develop a detailed responsive quote. The SBC/Ameritech quote will identify the technical feasibility of providing the desired service/functionality, pricing, timing of delivery and other pertinent attributes of the offering that SBC/Ameritech is able to provide in response to the customer's request.[5]

SBC first introduced the Special Request Process to the CLEC community at a collaborative session held on October 24, 2000 in Dallas, Texas. Numerous CLECs attended this meeting, including several of the parties to this proceeding. SBC outlined the process and conducted a follow-up question-and-answer session. At that time, certain CLECs voiced concerns with the process, which led SBC to re-evaluate the process. Following this re-evaluation, SBC presented a revised process to the CLEC community at a collaborative session held on January 25, 2001.

Q. WHAT CONTRACT AND/OR TARIFF LANGUAGE REGARDING THE SPECIAL REQUEST PROCESS WOULD AMERITECH ILLINOIS PROPOSE TO INCORPORATE INTO THE REQUIRED TARIFF?

A. Essentially, Ameritech Illinois proposes that the Special Request Process language presented as Attachment CJB-1 to my testimony be included in the Illinois Broadband UNE Tariff and govern any CLEC requests for new features and functions over the Project Pronto network architecture, including but not limited requests for such features as higher bandwidth CBR and new line cards. Attachment CJB-1 includes: (1) proposed tariff language for Illinois setting forth the provisions of the Special Request Process; and (2) proposed redlined changes to Section 9.5 of the draft Tariff, which account for the use of the process.

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[5] *Id.* at ¶ 8(a).

Q. PLEASE PROVIDE AN OVERVIEW OF THE SPECIAL REQUEST PROCESS.

A. The purpose of the Special Request Process is to evaluate unique CLEC serving arrangements intended for individual customers or applications over the Project Pronto network architecture. The Special Request Process establishes guidelines and a specific timeframe for dealing with these requests. I will briefly outline the process below.

STEP 1: INITIAL REQUEST AND APPLICATION

The first step in the process is for a CLEC to issue a Special Request using the standard Special Request form. The form must set forth the following information:

- The desired network and operations functionality (*e.g.*, the form of xDSL and /or ATM QoS requested);
- A technical description and service quality requirements (*e.g.*, the speed of service, pertinent service level guarantees etc.)
- Scope of deployment information including specific locations desired for deployment (*e.g.*, specific central office and remote terminal locations where the service is desired);
- Three-year demand forecasts/commitments (*e.g.*, demand forecast and potential commitment to purchase a certain quantity of such service);
- Date desired for service delivery.

The CLEC must submit a $100 application fee with this initial form of the Special Request. The CLEC can cancel a Special Request at any time by a written notice, although cancellation charges (to allow SBC to recover any developmental costs up to the time of cancellation) would apply. Further,

SBC has offered to conduct a pre-request meeting with a requesting CLEC to discuss the potential feature or function from a technical perspective prior to the request being formally issued. This assists the CLEC in the development of the request.

STEP 2: SBC ACKNOWLEDGEMENT, PRELIMINARY ANALYSIS & QUOTE

The second step in the process is the SBC Acknowledgement, Preliminary Analysis and Quote (the "Analysis and Quote"). In this step, SBC provides, within 10 business days of the initial request (Request Date ("RD") + 10), a written acknowledgement that it has received a request from the CLEC. Thereafter, SBC conducts a preliminary analysis to determine the viability of the request from both a business, technical and economic perspective. Under the terms of the Special Request Process, SBC must complete the Analysis and Quote within 45 business days (RD+45) of the CLEC's initial request.

The Analysis and Quote must include a price quote setting forth both monthly recurring and non-recurring charges and an estimate of the development and capital costs necessary to make available the new service/feature. This is a result of the collaborative sessions arising from the *Project Pronto Order*, during which the participating CLECs expressly requested that SBC provide a developmental cost estimate as part of its preliminary Analysis and Quote, and it allows the requesting CLEC to determine whether it wants to proceed with the deployment prior to committing substantial resources or capital.

This is a critical step in the process, of course, because it enables both the SBC ILEC and the CLEC to evaluate the requested new service/feature on a realistic economic basis. Such information will be especially helpful to the requesting CLEC or CLECs, which ultimately will be responsible for the development, capital and expense costs associated with making the new service/feature available.

Finally, the price quote and development cost estimate will include a cost cap, *i.e.*, the maximum estimated cost that the CLEC would be required to bear to deploy the new service/feature in the specified locations.

STEP 3: CLEC ACKNOWEDGEMENT

The third step in the process is the CLEC acknowledgement. The CLEC is allotted 30 business days (until, at the latest, RD+75) from the receipt of the SBC Analysis and Quote to make a determination as to whether or not it wants to proceed with the development of the service/feature. If the CLEC wishes to move forward with development, SBC and the CLEC then negotiate a product delivery date upon which the offering would be made commercially available to the CLEC. As part of this negotiation, SBC and the CLEC would discuss the manner in which the costs associated with making the product available, such as additional network capital and expense incurred by SBC in deploying additional network infrastructure to support CLEC desired services, would be recovered by SBC. For example, the requesting CLEC or CLECs may reimburse SBC for such costs up-front and/or commit to

purchase a certain volume of the service at a certain price in order to ensure sufficient recovery of development costs for SBC.

III. THE BENEFITS OF THE SPECIAL REQUEST PROCESS

Q. WHAT ARE THE RELATIVE BENEFITS OF USING THE SPECIAL REQUEST PROCESS AS REPRESENTED IN ATTACHMENT CJB-1?

A. The Special Request Process establishes a clear yet flexible procedure for evaluating CLEC requests that forces both parties – Ameritech Illinois and the CLEC – to confront real world technical and economic issues in a joint, collaborative fashion. This type of process is critical because, with respect to the rollout of any new feature or functionality and the associated introduction of a version of the Broadband UNE offering that uses a new line card, the parties will have to clear a variety of significant hurdles.

The current formulation in Section 9.5 of the Tariff does not offer these benefits. Instead, Ameritech Illinois must deploy any new line card (*i.e.*, offer other xDSL features and functions over the Pronto architecture) so long as the line card is compatible and "commercially available," a CLEC requests that it be deployed, and Ameritech Illinois can quickly determine whether such a new offering is technically and economically feasible. Then, Ameritech Illinois must complete the deployment within just 30 calendar days. This automatic 30-day deployment process is flawed in many respects, but perhaps most problematic is that it does not on its face envision, nor does it allow for, any useful coordination between Ameritech Illinois and the

requesting CLEC. There will be no time for collaboration about actual CLEC needs to meet customer demands, the geographic areas that are best suited for the new deployment, methods to overcome technical hurdles, or ways to properly share the costs and risks and maximize the economic efficacy of the deployment. This lack of an orderly, cooperative process will negatively affect both Ameritech Illinois and the requesting CLEC, as both parties will be rushed into a deployment decision without fully understanding – and perhaps solving – all of the technical and economic challenges and repercussions of that deployment.

In the end, the current Section 9.5 is likely to force unnecessary litigation over these issues, because it is unlikely that Ameritech Illinois could (for reasons that I describe later in my testimony) under any circumstance meet the 30-day deployment requirement for new NGDLC line cards. Indeed, even the current proposed Tariff recognizes that Ameritech Illinois should not automatically be obligated to deploy a new feature or functionality if it would not be "technically or economically feasible" to do so. These concepts of economic and technical feasibility are important and properly belong in any provision dealing with a requirement to deploy new technology, but they are no substitute for the orderly process guaranteed by the Special Request Process. The concept of economic infeasibility in particular provides Ameritech Illinois with important additional protection in those instances when it and the requesting CLEC cannot agree on the viability of the new technology or the scope, means or costs of a particular deployment. And to be of any real use in the context of the Tariff, the notion of economic feasibility will have to account for real

world actual costs and the downstream financial impact of the particular deployment. That notion is best applied in a case-by-case manner when the Special Request Process has not resulted in complete agreement between Ameritech Illinois and the requesting CLEC, rather than on a rushed basis when there has been no time for meaningful cost development or consultation with the requesting CLEC. The Special Request Process uses a structured approach that still lends flexibility and collaboration to the deployment process, which is the best way to evaluate and effect a proposed new deployment.

Moreover, the Commission already has recognized the propriety of employing the Special Request Process. Section 7.7.2 of the Tariff requires that CLEC requests for CBR functionality in excess of 96 kbps must be handled through SBC's Special Request Process. This use of the Special Request Process is, under the language of Section 7.7.2, to work in tandem with Ameritech Illinois' right to resist deploying the functionality if it can prove that to do so would be economically infeasible. While adding to the CBR functionality is not technically the same as deploying a new line card, both actions boil down to essentially the same thing: enhancing the features and functions of the services offered over the Pronto DSL architecture in response to a specific CLEC request. Accordingly, it makes common sense to employ the same paradigm to both Section 7.7.2 and Section 9.5.

Q. PLEASE FURTHER EXPLAIN WHY THE 30-DAY RESPONSE TIME IS INSUFFICIENT.

A. In order to deploy a new type of xDSL line card in its Project Pronto DSL NGDLCs, Ameritech Illinois would have to not only place new hardware (namely, the line

cards) in specific RT sites, but also upgrade the software supporting each individual RT site. Prior to the placement of any additional hardware or software, however, SBC must test the affected components to resolve numerous potential technical issues. Such a process typically takes a minimum of six months to complete. In short, the mere fact that a vendor such as Alcatel offers a new form of line card does not mean that Ameritech Illinois can simply plug the card into the NGDLC and offer a new form of xDSL service. In fact, it would be irresponsible for Ameritech Illinois to do so.

For example, as discussed in the prior hearings in this proceeding, Ameritech Illinois is anticipating deploying what is referred to as the quad card, which became available from Alcatel with Litespan Release No. 11.0. Even this relatively benign addition to the Pronto architecture (at least in contrast to the offering of new xDSL services and ATM QoS offerings, as envisioned under Section 9.5 of the Tariff) is expected to take SBC over four months to test. The new xDSL hardware and software must be tested in both a lab and real world (field) setting, which allows SBC to: (1) ensure that the placement of additional xDSL line cards in the same line-ups (channel banks) as existing ADLU cards does not detrimentally affect existing service offerings; and (2) determine the proper quantity of the new xDSL line cards to be deployed and the proper mix of services-per channel-bank (*e.g.*, how many G.SHDSL cards should be placed in the same channel bank as ADLU cards, which slots the G.SHDSL cards should be placed into so as to maximize the volume of services that could be provisioned over a channel bank, etc.).

Further, Ameritech Illinois is responsible for maintaining service quality and must, therefore, ensure that any new product will not cause a service disruption – not only for data services but for voice services as well. Indeed, to ensure that a new feature or function is appropriate for deployment, Ameritech Illinois must first determine, at a minimum, the following:

- the ability to install and activate the new feature, function or ATM QoS;
- the ability to provision service in a timely and cost effective manner;
- the ability to monitor and receive alarms in the case of a maintenance failure;
- backwards compatibility with existing service offerings; and
- the stability of the overall platform following the placement of a new card.

It would be difficult to overstate either the necessity of thoroughly performing the steps outlined above or the impossibility of completing them within a set 30-day period.

Q. WHAT ARE SOME OF THE REAL WORLD POTENTIAL IMPLICATIONS OF INSUFFICIENT TESTING THAT COULD RESULT FROM A MANDATED 30-DAY DEPLOYMENT REQUIREMENT?

A. Many of the problems that have been identified to date are due to the fact that Ameritech Illinois' vendors typically test in a lab environment, which can differ considerably from a real world field application of the technology. Vendors are typically unaware of all aspects of a company's network and, therefore, real world

testing is necessary to ensure that a new technology will work in the company's existing network. Some examples of problems include the following:

- In the absence of detailed research conducted by SBC Technology Research Inc. ("SBC-TRI"), SBC's research organization, there is no guarantee that a vendor's products will meet specifications for deployment.

- Without interoperability testing, there is no guarantee that the NGDLC equipment will work in conjunction with the OCD.

- The software loaded in each RT site may not support the cards deployed in that RT site. If the software load for the NGDLC does not match the card's requirement, the card will not work.

- As different line cards are introduced into the system, each potentially offering different types of xDSL or utilizing different ATM QoS, it is necessary to determine the appropriate mix of line cards and ATM QoS offerings in a given RT site in order to ensure sufficient bandwidth and avoid a system crash.

These are just a few examples of potential problems. One common analogy that could be drawn would be the introduction of Microsoft Windows XP. Simply because Microsoft issues a new version of Windows does not mean that it can or should be deployed on every PC that currently meets Microsoft's technical requirements. Hardware and software interact differently in different environments. Whereas one PC may meet Microsoft's standard for deployment and all of its hardware may be capable of supporting a new operating system, there are other PCs that contain hardware that may not be capable of supporting a new version without

undergoing modification. The same analogy holds true in regards to RT sites. Whereas one RT site may be suitable for the placement of a certain quantity of a new line card and a new software release with little or no implications, another RT site may contain a mix of services and line cards that materially complicates the matter. The end result of not testing and preparing for these potential service problems is an increased likelihood of an unsatisfactory level of service in Illinois.

This is of particular concern when one considers that the line cards being placed within the Pronto RT sites not only provide the desired xDSL service, but in many instances provide both a POTS and ADSL function to the same customer (*e.g.*, the ADLU card). If a particular vintage of line card deployed in an RT site lacked the necessary testing for its potential impact on other line cards in the same channel bank of the system (such as ADLU cards), there may be disruption not only of that end user's xDSL service but also the end user's xDSL and POTS service.

Q. REGARDLESS OF THE TESTING PROBLEMS LISTED ABOVE, WOULD IT BE POSSIBLE FOR AMERITECH ILLINOIS TO DEPLOY A NEW LINE CARD WITHIN 30 DAYS?

A. No. Given the complexities in developing a new product offering, it is simply not possible to develop a new product offering within a 30-day time period. Given the fact that SBC's Broadband Service involves numerous provisioning and operational systems, the offering of a new feature or function could potentially entail detailed system enhancements, the augmentation of the CLEC electronic service ordering interfaces, and other complexities. It is unlikely that any, much less all, of the functions involved could be completed in a 30-day time period.

Q. HOW WOULD THE SPECIAL REQUEST PROCESS HELP ALLEVIATE THE PROBLEMS IN THE EXISTING PROPOSED TARIFF LANGUAGE?

A. The Special Request Process would achieve this primarily by removing the 30-day requirement on the deployment of new NGDLC line cards and allowing for a flexible, negotiated window for testing and service introduction. Further, the Special Request Process requires CLECs to provide forecasts of demand and specific information in regard to the central offices and remote terminal sites at which the CLEC desires the new feature or function. Therefore, the process allows Ameritech Illinois to better analyze the scope of deployment and test accordingly. Additionally, because the service delivery date is negotiated between the parties, Ameritech Illinois can factor in the necessary time for testing and product development into its Analysis and Quote. Thereafter, both parties can work cooperatively towards a negotiated date.

Q. WHAT ADDITIONAL COSTS WOULD AMERITECH ILLINOIS POTENTIALLY INCUR IN MAKING AVAILABLE NEW FEATURES AND FUNCTIONS PURSUANT TO THE EXISTING TARIFF LANGUAGE?

A. As I addressed in both my direct and rebuttal testimony on rehearing, and as is reflected in the transcripts in this case, there is a clear risk that the provision of new types of ATM QoS or xDSL service would drive significant additional costs into Ameritech Illinois' network. As was established in the last round of hearings in this case, the provisioning of additional xDSL services, such as higher bandwidth CBR in conjunction with SDSL and/or G.SHDSL, or any other new feature or functionality, could dramatically reduce the available bandwidth between a given RT site and the central office OCD. The least costly way to respond to this problem would be to

engage in what is commonly referred to as "breaking the daisy chain." But, that process still would involve a substantial increase in costs. In particular, it would entail providing a dedicated OC-3c to each channel bank in each RT site in order to increase the available bandwidth. Therefore, any additional service provisioned to a given RT site would lead to a necessary increase in bandwidth and significant additional capital costs.

Q. HOW DOES THE SPECIAL REQUEST PROCESS ADDRESS THESE COST CONCERNS?

A. The Special Request Process allows both parties to evaluate the costs and risks of enhancing the Project Pronto architecture and create a business relationship geared to the CLEC's actual needs. This contrasts sharply with the litigious relationship that would likely result from the current formulation of Section 9.5.

In other words, if Ameritech Illinois were to develop a new offering in response to a CLEC request, with no commitment from the CLEC, all of the risk and burden of developing such an offering would lie with Ameritech Illinois. That would unfairly shift the risk of the CLEC's business model to Ameritech Illinois. Ultimately, the Special Request Process mitigates this concern by requiring CLECs and Ameritech Illinois to enter into a commercial relationship and agree to specific terms that will help ensure sufficient cost recovery for Ameritech Illinois. Therefore, both Ameritech Illinois and the CLEC would share in the capital investment risk that such new service offerings would entail.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY ON SECOND REHEARING?

A. Yes.

ATTACHMENT CJB-1

AMERITECH-ILLINOIS PROPOSED SPECIAL REQUEST LANGUAGE

9 AVAILABILITY OF FUTURE FEATURES AND FUNCTIONALITIES

9.1. At this time only ADSL/UBR and ADSL/CBR Quality of Service ("QoS") offerings are available in conjunction with the Broadband UNE as outlined in this section of the Tariff.

9.1. AMERITECH-ILLINOIS shall continue its collaborative efforts with CLECs to ensure that additional capabilities that are technically feasible are introduced for the benefit of all end-users.

9.1. Should the vendor of the NGDLC deployed in conjunction with Project Pronto develop in the future, for use with the Project Pronto NGDLC equipment a feature or functionality (such as other versions of xDSL or additional ATM QoS offerings) desired by CLEC, or should CLEC desire a higher grade ATM QoS than currently made available, CLEC may submit a request for such feature, function or QoS via the Special Request Process outlined in this Tariff.

9.1. SPECIAL REQUEST

9.1.1. Should CLEC desire a specific service and/or functionality not presently offered in the AMERITECH-ILLINOIS tariff, CLEC will follow the Special Request Process outlined herein. This process is specifically designed to examine technical and economic feasibility, formulate developmental processes, indicate pricing and provide deployment timeframes for the unique service and/or functionality being requested. If requested by CLEC, AMERITECH-ILLINOIS will hold a review meeting prior to the actual submission of the Special Request to discuss the specific arrangement with CLEC in an attempt to determine technical feasibility.

9.1.1. CLEC will submit, in writing to AMERITECH-ILLINOIS the Special Request Process Application, with appropriate operational narrative, drawings, technical references, location(s) for deployment, requested implementation date(s), and a forecasted quantity over a (36) month period. A $100 fee will accompany the Special Request application. This Application is available in the CLEC Handbook.

9.1.1. AMERITECH-ILLINOIS will acknowledge receipt of the form within ten (10) business days.

9.1.1. AMERITECH-ILLINOIS shall provide a preliminary analysis no later than forty-five (45) business days following CLEC issuance. AMERITECH-ILLINOIS will return to the CLEC an analysis with a price quote with indication of a cap on the anticipated developmental costs, based on the information provided by the CLEC.

9.1.1. CLEC will notify AMERITECH-ILLINOIS, by written authorization to proceed within thirty (30) business days from receiving the AMERITECH-ILLINOIS analysis and price quote. At this time the CLEC will make a determination to pursue or cancel the request.

9.1.1. If CLEC requests to proceed, AMERITECH-ILLINOIS shall inform the CLEC of the prospective delivery date as soon as available. CLEC will be responsible for the up front developmental and capital and expense costs incurred by AMERITECH-ILLINOIS in response to any request for which the CLEC has requested AMERITECH-ILLINOIS to proceed. Such costs will include, but not be limited to, capital and expense costs to deploy additional facilities, equipment and/or labor in order to support services requested by the CLEC.

9.1.1. Should CLEC cancel the request, after informing AMERITECH-ILLINOIS that it wishes to proceed, cancellation charges will be applied, not to exceed the costs incurred by AMERITECH-ILLINOIS up to and including the point of cancellation.